



Bradley S. Dion

**Account Executive**  
**Strategic Resolution Group, Baltimore**

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Hunt Valley, MD 21031

**SENT VIA EMAIL– RECEIPT ACKNOWLEDGEMENT REQUESTED**

September 5, 2019

Mr. Peter D. Protopapas, Esq.  
Rikard & Protopapas, LLC  
1329 Blanding St.  
Columbia, SC 29201  
[pdp@rplegalgroup.com](mailto:pdp@rplegalgroup.com)

**RE:    Alleged Policyholder:    Southern Insulation, Inc.**  
**Lawsuits:                      See “Attachment A”**

Dear Mr. Protopapas,

This letter serves to acknowledge receipt of the above-referenced lawsuits (“Lawsuits”). Please be advised that this matter is being investigated by the Strategic Resolution Group in Baltimore, Maryland.

Travelers is in receipt of your tender of the *Robert Ashworth, Robert Aspray, Teddy Knight and James Smith* lawsuits as Court appointed Receiver for Southern Insulation. Based upon the Court order appointing you Receiver in Southern Insulation asbestos matters you have requested Travelers conduct a policy search in order to determine whether Travelers may have issued coverage to Southern Insulation, the entity referenced in the court’s order.

It is my understanding based upon Jescelyn Spitz’s email dated June 14<sup>th</sup>, 2019 that you have requested and received additional time to respond to previously received Lawsuits for Southern Insulation. In addition, recently in discussions with our in-house counsel Jerry Begley, you indicated that plaintiff’s counsel had been advised that you are currently investigating what coverage Southern Insulation may have had and that you needed additional time in order to secure whatever coverage, if any, may be available to it. Attorney Begley advised that we expected to reach a coverage determination shortly and you have advised that you will continue to take whatever additional steps may be appropriate to protect Southern Insulation’s interests while our coverage investigation is ongoing and protect against any default should plaintiffs proceed to seek one.

Please be advised that we have conducted a search of our records and have not been able to locate any general liability policies of insurance purportedly issued to Southern Insulation. Accordingly, based on the results of our investigation to date, we cannot agree to provide Southern Insulation with a defense in these matters. We are continuing our investigation into

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your inquiries regarding Dover Insulation, and Piedmont Insulation and will contact you with the final results of our investigation once it is concluded.

Travelers fully reserves its rights in the Lawsuits. Neither this acknowledgment or any further communication, action, or investigation shall be deemed or construed as a waiver of any of the rights and defenses available to Travelers, including those available under any policy of insurance which may have been issued to Southern Insulation.

Please address any further correspondence relative to this matter to my attention. If you should have any questions, comments or concerns, please do not hesitate to contact me at (443) 353-1333.

Sincerely,

The image shows a handwritten signature in black ink. It appears to be the name 'Bradley Dion' written in a cursive, stylized script. The signature is composed of two parts, likely first and last names, separated by a small gap.

Bradley Dion  
Account Executive  
Strategic Resolution Group

Cc (via email):

Mr. Jerry Begley  
Travelers  
[GBEGLEY@travelers.com](mailto:GBEGLEY@travelers.com)

**Attachment A**

Nell Ashworth, individually and as Personal Representative of the Estate of Robert J. Ashworth v. Fisher Controls International, LLC, et al., (including Southern Insulation, Inc.); Court of Common Pleas, Fourteenth Judicial Circuit, Hampton County, SC; C/A No.: 2019-CP-50-00325

Robert E. Aspray v. Armstrong International, Inc., et al., (including Southern Insulation, Inc.); Court of Common Pleas, Fifth Judicial Circuit, Richland County, SC; C/A No.: 2019-CP-40-04667

Richard L. Knight, II as Personal Representative of the Estate of Teddy L. Knight, Sr and Linda Knight, individually, v. Eastman Chemical Company, et al., (including Southern Insulation Company.); Court of Common Pleas, First Judicial Circuit, Orangeburg County, SC; C/A No.: 2019-CP-38-01045

James W. Smith and Frances R. Smith v. Armstrong International, Inc., et al., (including Southern Insulation, Inc.); Court of Common Pleas, Fifth Judicial Circuit, Richland County, SC; C/A No.: 2019-CP-40-04326